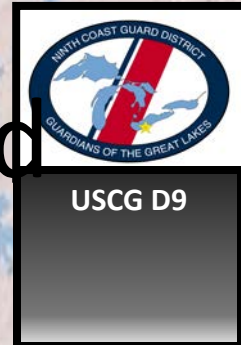


ACP Review Process Background



- 40 CFR 300 Appendix E – Oil Spill Response/NCP
- 4.0 Preparedness Activities – NCP/RCP/ACP
- 4.1.3 Area Contingency Plans

Deepwater Horizon ISPR



- Incident Specific Preparedness Review
- Background
- General Findings and
- Focus Areas
 - Planning and Plan execution - AC activity/ ACP policy
 - Organization - Role of RRT's
 - Response and Readiness – LL from prior spill responses

General Findings

- USCG MER programs
- ACP's
- ESA's



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BP DEEPWATER HORIZON OIL SPILL

Incident Specific
Preparedness Review (ISPR)



FINAL REPORT
January 2011

Focus Area: Planning and Plan execution

- AC organization and activity
- ACP policy and implementation
- Integration of Oil Spill Contingency Plans for a Regional Response
- Use of In Situ Burning



Focus Area: Organization



- Role of RRT's
 - ISPR focus was mainly on pre-authorizations
 - ACP's and ESA's

Focus Area: Resources and Readiness

- Application of Lessons Learned from prior oil spills





- A lot of Background
- Comments or questions?

RRT V Plan Review and Approval Process



Bob Allen – USCG Ninth District Planning



USCG D9

BP DEEPWATER HORIZON OIL SPILL

Incident Specific
Preparedness Review (ISPR)



**FINAL REPORT
January 2011**

**Deepwater Horizon ISPR
Identified several systemic problems related
to:**

- **Emergency Preparedness**
- **Area Contingency Plans**
- **Area Committee Involvement**
- **Lessons-Learned Applications**

participation by state and local governments, shall be determined by the designated RRT chair for the incident, based on the RCP. The incident-specific RRT supports the designated OSC. The designated OSC manages response efforts and coordinates all other efforts at the scene of a discharge.

(c) The representatives of EPA and the USCG shall act as co-chairs of the RRTs except when the RRT is activated. When the RRT is activated for response actions, the chair is the member agency providing the OSC.

(d) Each participating agency should designate one member and at least one alternate member to the RRT. Agencies whose regional subdivisions do not correspond to the standard federal regions may designate additional representatives to the standing RRT to ensure appropriate coverage of the standard federal region. Participating states may also designate one member and at least one alternate member to the RRT. Indian tribal governments may arrange with the RRT for representation appropriate to their geographical location. All agencies and states may also provide additional representatives as observers to meetings of the RRT.

(e) RRT members should designate representatives and alternates from their agencies as resource personnel for RRT activities, including RRT work planning, and membership on incident-specific teams in support of the OSCs.

(f) Federal RRT members or their representatives should provide OSCs with assistance from their respective federal agencies commensurate with agency responsibilities, resources, and capabilities within the region. During a response action, the members of the RRT should seek to make available the resources of their agencies to the OSC as specified in the RCP and ACP.

(g) RRT members should nominate appropriately qualified representatives from their agencies to work with OSCs in developing and maintaining ACPs.

(h) Affected states are encouraged to participate actively in all RRT activities. Each state Governor is requested to assign an office or agency to represent the state on the appropriate RRT; to designate representatives to work with the RRT in developing RCPs; to plan for, make available, and coordinate state resources for use in response actions; and to serve as the contact point for coordination of response with local government agencies, whether or not represented on the RRT. The state's RRT representative should keep the State Emergency Response Commission (BERC) apprised of RRT activities and coordinate RRT activities with the BERC. Local governments are invited to participate in activities on the appropriate RRT as provided by state law or as arranged by the state's representative. Indian tribes are also invited to participate in such activities.

(1) The standing RRT shall recommend changes in the regional response organization as needed, revise the RCP as needed, evaluate the preparedness of the participating agencies and the effectiveness of ACPs for the federal response to discharges, and provide technical assistance for preparedness to the response community. The RRT should:

(1) Review and comment, to the extent practicable, on local emergency response plans or other issues related to the preparation, implementation, or exercise of such plans upon request of a local emergency planning committee;

(2) Evaluate regional and local responses to discharges on a continuing basis, considering available legal remedies, equipment readiness, and coordination among responsible public agencies and private organizations, and recommend improvements;

(3) Recommend revisions of the NCP to the RRT, based on observations of response operations;

(4) Review OSC actions to ensure that RCPs and ACPs are effective;

(5) Encourage the state and local response community to improve its preparedness for response;

(6) In coordination with the Area Committee and in accordance with any applicable laws, regulations, or requirements, conduct advance planning for use of dispersants, surface washing agents, surface collecting agents, burning agents, bioremediation agents, or other chemical agents in accordance with subpart J of this part;

(7) Be prepared to provide response resources to major discharges or releases outside the region;

(8) Conduct or participate in training and exercises as necessary to encourage preparedness activities of the response community within the region;

(9) Meet at least semiannually to review response actions carried out during the preceding period, consider changes in RCPs, and recommend changes in ACPs;

(10) Provide letter reports on RRT activities to the RRT twice a year, no later than January 31 and July 31; and

(11) Ensure maximum participation in the national exercise program for announced and unannounced exercises.

(j)(1) The RRT may be activated by the chair as an incident-specific response team when a discharge:

(A) Exceeds the response capability available to the OSC in the place where it occurs;

(B) Transects state boundaries;

(C) May pose a substantial threat to the public health or welfare, or to regionally significant amounts of property; or

(D) Is a worst case discharge, as defined in section 1.5 of this appendix.

(2) The RRT shall be activated during any discharge upon a request from the OSC, or

Regional Response Team ACP/RCP/NCP Planning Duties:

40 CFR Part 300 Appendix E, Part 3.2(2) (i) 1-9

- Revise RCP
- Evaluate ACPs
- Review/Comment on Local Emergency Plans
- Review Response Actions, Determine ACP Effectiveness
- Engage Technical Specialists as Necessary
- Recommend Changes to the NCP





Region V RRT Planning Subcommittee Duties:

Quarterly / Semi-annually ?

- **Review & Revise the RCP**
- **Review 5 – Area Contingency Plans for the Great Lakes / Region V**
- **Review State and local Plans as necessary**
- **Engage Technical Specialists as necessary**
- **Recommend Changes to the NCP**



REGION V PLANNING SUBCOMMITTEE CHARTER

- PURPOSE:** In accordance with 40 CFR 300, Appendix E, the Region V Regional Response Team Planning Subcommittee will provide robust planning support to Region V FOSCs, the RRT Co-Chairs and Standing Regional Response Team. Support will include but not be limited to the review of applicable federal, state, and local contingency plans, FOSC response activities, lessons-learned from preparedness exercises and actual emergency response operations, and outreach activities associated with maintaining and nurturing Area Committee membership and participation.
- MEMBERSHIP:** Members of the Planning Subcommittee shall be designated by the RRT Co-chairs as appropriately qualified representatives from their agencies to work with FOSC's in developing and maintain applicable contingency plans.
- REPORTING:** The Planning Subcommittee will report directly to the RRT Co-Chairs.
- STAFF:** At least one appropriately qualified member of the Ninth Coast Guard District staff and USEPA Region V staff will serve on the RRT V Planning Subcommittee.
- MEETINGS:** The Planning Subcommittee will meet semi-annually or more often as may be necessary to review FOSC response operations, Lessons-Learned, ACP and RCP documentation and to prepare for semi-annual RRT meetings.
- RESPONSIBILITIES:** The Region V Planning Subcommittee is responsible for: (1) Revising the Regional Contingency Plan. (2) Reviewing Region V Area Contingency Plans for effectiveness, alignment with the RCP and NCP, and to recommend appropriate revisions to all contingency plans. (3) Reviewing Lessons-Learned from preparedness exercises and FOSC response activities to ensure appropriate support. (4) Support emergency response operations as necessary. (5) Encourage public and private sector participation on Area Committees throughout Region V.

Stephen H. Torpey
USCG District Nine, RRT Co-Chair

Jason H. El-Zein
USEPA Region 5, RRT Co-Chair



Future Plans

- Consider Work Plan or Charter?
- Revise RCP?
- Review Applicable ACPs for 2011?
- Enhance Area Committee Outreach?
- Consider Technical Upgrades?